

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE DISTRICT OF SOUTH CAROLINA
ANDERSON DIVISION

UNITED STATES OF AMERICA

CRIMINAL NO.:

8:24-36

18 U.S.C. § 371

18 U.S.C. § 922(a)(1)(A)

18 U.S.C. § 923(a)

18 U.S.C. § 924(a)(1)(D)

-versus-

CHAD MICHAEL SPEARMAN

SEALED INDICTMENT

COUNT 1

THE GRAND JURY CHARGES:

1. That beginning at a time unknown to the grand jury, but beginning from at least in or around October of 2021, and continuing thereafter, up to and including June 7, 2022, in the District of South Carolina, Defendant **CHAD MICHAEL SPEARMAN** knowingly and willfully did combine, conspire, confederate, and agree together with Individual Number One and others unknown to the grand jury, to commit the following violations:

- a. To make false statements with regard to the acquisition of firearms from licensed firearm dealers, in violation of Title 18, United States Code, Section 922(a)(6).

MANNER AND MEANS

2. It was part of the conspiracy that Defendant **CHAD MICHAEL SPEARMAN** would by dishonest means, procure firearms, under the guise of purchasing firearms for himself, when in fact, the firearms were intended to be sold and used by others;

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3. It was further part of the conspiracy that Individual Number One and others unknown to the grand jury would request that Defendant **CHAD MICHAEL SPEARMAN** purchase firearms on their behalf;

4. It was further part of the conspiracy that Individual Number One and others unknown to the grand jury would meet Defendant **CHAD MICHAEL SPEARMAN** at or around the time he purchased firearms from federal firearms licensees (FFLs), would reimburse Defendant **CHAD MICHAEL SPEARMAN** for the price of the firearm(s) he purchased from the FFL(s), would pay Defendant **CHAD MICHAEL SPEARMAN** a commission for purchasing the firearm(s) on their behalf, and would take possession of the firearm(s).

5. It was further part of the conspiracy that Defendant **CHAD MICHAEL SPEARMAN**, Individual Number One, and others unknown to the grand jury would engage in the business of dealing in firearms without a license.

OVERT ACTS

6. In furtherance of the conspiracy and to affect the objects of the conspiracy, the following overt acts, among others, were committed in the District of South Carolina and elsewhere:

- a. From in or around October of 2021, and continuing thereafter, up to and including June 7, 2022, Defendant **CHAD MICHAEL SPEARMAN** straw purchased firearms and transferred them to Individual Number One, and to others, known and unknown to the grand jury;
- b. From in or around October of 2021, and continuing thereafter, up to and including June 7, 2022, Defendant **CHAD MICHAEL SPEARMAN** received payments from

Individual Number One and others, unknown to the grand jury, in return for straw purchasing firearms on their behalf.

c. Count 2 is incorporated herein, as if set forth verbatim, as overt acts.

All in violation of Title 18, United States Code, Section 371.

COUNT 2

THE GRAND JURY FURTHER CHARGES:

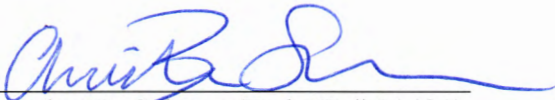
That beginning at a time unknown to the grand jury, but beginning at least in or around October of 2021, and continuing thereafter, up to and including June 7, 2022, in the District of South Carolina and elsewhere, **CHAD MICHAEL SPEARMAN**, not being a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, did willfully engage in the business of dealing in firearms;

In violation of Title 18, United States Code, Sections 922(a)(1)(A), 923(a) and 924(a)(1)(D).

A True BILL

REDACTED
FOREPERSON

ADAIR F. BOROUGHS
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